

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

PLUMBERS & PIPEFITTERS LOCAL 178 HEALTH
& WELFARE TRUST FUND, on behalf of itself and
others similarly situated

Plaintiff,

v.

ACTAVIS HOLDCO U.S., INC.; TEVA
PHARMACEUTICALS USA, INC.; TEVA
PHARMACEUTICAL INDUSTRIES LTD.; MYLAN,
INC.; MYLAN PHARMACEUTICALS INC.; UDL
LABORATORIES, INC.; ENDO INTERNATIONAL
PLC; PAR PHARMACEUTICAL HOLDINGS, INC.;
QUALITEST PHARMACEUTICALS, INC.;
HERITAGE PHARMACEUTICALS INC.;
BRECKENRIDGE PHARMACEUTICALS, INC.;
UPSHER-SMITH LABORATORIES, INC.; and
ROUSES POINT PHARMACEUTICALS, LLC

Defendants.

Case No. 17-cv-0144 (CMR)

ORAL ARGUMENT
REQUESTED

**NOTICE OF DEFENDANTS HERITAGE PHARMACEUTICALS INC.'S AND
UPSHER-SMITH LABORATORIES, INC.'S
MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

Pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure, Defendants Heritage
Pharmaceuticals Inc. and Upsher-Smith Laboratories, Inc. (together, “Out-of-State Defendants”)
hereby move this Court for an order under dismissing all claims against the Out-of-State
Defendants. As explained in greater detail in the accompanying Memorandum of Law, all
claims should be dismissed because this Court may not exercise personal jurisdiction over the
Out-of-State Defendants in this action.

Dated: March 7, 2017

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Respectfully submitted,

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***Attorneys for Defendant Heritage
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CERTIFICATE OF SERVICE

I hereby certify that on March 7, 2017, the foregoing Notice of Defendants Heritage Pharmaceuticals Inc.'s and Upsher-Smith Laboratories, Inc.'s Motion to Dismiss for Lack of Personal Jurisdiction was served via the Court's CM/ECF system, which will send notification and a copy of such filing to all counsel of record. I further certify that the foregoing document is available for viewing and downloading from the CM/ECF system.

/s/ D. Jarrett Arp
D. Jarrett Arp